

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

CASE NO: 15-33412-KLP

THOMAS GLENN
DAVIDSON,
Address: 6918 Velvet Antler Drive
Midlothian, VA 23112

CHAPTER 13

Debtor(s).

SUNTRUST MORTGAGE, INC.
Plaintiff,

v.

THOMAS GLENN DAVIDSON,
Debtor(s)
CARL M. BATES

Defendants.

NOTICE OF OBJECTION

SunTrust Mortgage, Inc., a creditor in this case, has filed papers with the court to object to the confirmation of the Chapter 13 plan with regard to certain property more particularly described in those papers which are attached.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you want the Court to consider your views on the Objection to the Confirmation of the Chapter 13 Plan, then you or your attorney must:

File with the Court, at the address shown below, a written response pursuant to Local Bankruptcy Rules 9013-1(H). If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive** it before the date stated below.

U.S. Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219-1888

You must also mail a copy of any such response to:

T. Jackson Stewart, Esquire
Brock & Scott, PLLC
484 Viking Dr., Ste 100
Virginia Beach, VA 23452

Attend the confirmation hearing that will be conducted in the Richmond Division of the US Bankruptcy Court, 701 East Broad Street, Richmond, Virginia 23219-1888 on **October 14, 2015 at 9:10 AM in Courtroom 5100**.

If no timely response has been filed opposing the request, the Court may deny confirmation of the Chapter 13 Plan.

If you or your attorney do not take these steps, the Court may decide that you do not oppose and may enter an Order denying confirmation of the Chapter 13 Plan

Date: September 18, 2015

Signature: /s/T. Jackson Stewart
Name: T. Jackson Stewart, VSB#
48412
Brock & Scott, PLLC
484 Viking Dr. Ste 23
Virginia Beach, VA 23452
757-213-2959 (x3023)
vaecf@brockandscott.com

CERTIFICATE OF SERVICE

The foregoing notice was endorsed by and/or served upon all necessary parties pursuant to Local Rules by electronic notification and/or U.S. First Class Mail, postage pre-paid.

Julia Bonham Adair
710 N. Hamilton Street
Suite 200
Richmond, VA 23221
Counsel for Debtor

Thomas Glenn Davidson
6918 Velvet Antler Drive
Midlothian, VA 23112
Debtor

Carl M. Bates
P. O. Box 1819
Richmond, VA 23218
Trustee

/s/ T. Jackson Stewart
T. Jackson Stewart, VSB# 48412
Brock & Scott, PLLC
484 Viking Dr., Ste. 203
Virginia Beach, VA 23452
757-213-2959
vaecf@brockandscott.com
Counsel for the Movant

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OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW, SunTrust Mortgage, Inc. (hereinafter, “SunTrust”), a secured creditor in the above-captioned case, by and through counsel, Brock & Scott, PLLC, and objects to confirmation of the Debtor’s Chapter 13 Plan, on the following grounds:

1. On July 7, 2015, the Debtor filed a petition with the Bankruptcy Court for the Eastern District of Virginia under Chapter 13 of Title 11 of the United States Code.
2. SunTrust holds a secured claim by virtue of a First position deed of trust lien dated April 1, 2003 on real property (hereinafter “Property”) described in that Deed of Trust recorded in Chesterfield County Register of Deeds, in Book 5015 at Page 722 and recorded on April 7, 2003, (hereinafter “Deed of Trust”) with an address of 6918 Velvet Antler Drive, Midlothian, VA 23112.
3. SunTrust holds or is otherwise entitled to enforce a Promissory Note secured by the Deed of Trust from the Debtor in the original principal amount of \$43,500.00 and dated April 1, 2003.

4. Movant does not accept Debtors' proposed plan. The pre-petition arrearage set forth in the Debtors' proposed plan is not accurate inasmuch as the approximate arrearage as of the date of filing was \$29,287.26.

WHEREFORE, SunTrust Mortgage, Inc. prays the Court grant the following relief:

1. Require Debtor's Plan be modified to provide for SunTrust as fully secured; and
2. For such other and further relief that the Court may deem necessary and proper.

Respectively submitted, this the 18th day of September, 2015.

BROCK AND SCOTT, PLLC

/s/ Trenita Jackson Stewart
Trenita Jackson Stewart, Esq.
VSB# 48412
Attorney for Movant
Brock & Scott, PLLC
484 Viking Drive, Suite 203
Virginia Beach, VA 23452
757-213-2959
Fax: 757-416-6488

CERTIFICATE OF SERVICE

The foregoing objection was endorsed by and/or served upon all necessary parties pursuant to Local Rules by electronic notification and/or U.S. First Class Mail, postage pre-paid.

Julia Bonham Adair
710 N. Hamilton Street
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Richmond, VA 23221
Counsel for Debtor

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Trustee

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